

LFV/FJS:lks
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 00-6022-CIV-LENARD
Magistrate Judge Turnoff

HENRY NARANJO and
MARLENE RAMIREZ,

Plaintiffs,

v.

STEPHEN BYRON SMITH, and
PALMER JOHNSON, INC.,

Defendants.

_____ /

NIGHT BOX
FILED
AUG 20 2001
CLARENCE MADDOX
CLERK, USDC / SDFL / MIA

**AGREED MOTION FOR EXTENSION OF
TIME TO SUBMIT FACT DISCOVERY**

COMES NOW, the Defendant, PALMER JOHNSON, INC., by and through its undersigned attorneys, and files this Agreed Motion for Extension of Time to Submit Fact Discovery Deadline in support thereof, and states as follows:

1. That pursuant to this Court's most recent Trial Order, the fact discovery deadline has been set at August 20, 2001.
2. However, because of the number of parties and experts, and the recent joinder of Tom Fexas as a Third Party Defendant, the parties could not complete the fact discovery within the present time parameters.
3. That the best present estimate of additional time necessary to complete discovery would be an additional 60 days, Friday, October 19, 2001.

4. That this motion is made in good faith for the good causes outlined above, and not for the purpose of delay; and that this defendant has contacted the other parties in this case and they have agreed to this motion.


WHEREFORE the Defendant, PALMER JOHNSON, INC., prays that this Court enter an order granting this Agreed Motion for Extension of Time to Submit Fact Discovery, and provide that fact discovery may be completed up through and including October 19, 2001.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing motion has been furnished by mail this **20th** day of August, 2001 to: **Manuel Valdes, Esquire**, Law Offices of Manuel Valdes, Attorneys for Plaintiffs, 910 Madrid Street, Coral Gables, Florida 33134; **F. David Famulari, Esquire**, Co-Counsel for Plaintiffs, Blanck & Perry, P.A., 5730 SW 74th St., Suite 700, Miami, FL 33143; **John D. Kallen, Esquire**, Badiak, Will & Kallen, Attorneys for Stephen Byron Smith, 17071 West Dixie Highway, North Miami Beach, Florida 33160; **David L. Weber, Esquire**, Pinkert Law Firm LLP, 454 Kentucky Street, P.O. Box 89, Sturgeon Bay, WI 54235-0089; **Joseph L. Mannikko, Esquire**, Mannikko & Baris, P.A., Attorneys for Tom Fexas Yacht Design, Inc., 870 SW Martin Downs Blvd., Suite 1, Palm City, Florida 34990.

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